



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

BLUE RIDGE REGIONAL OFFICE

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Regional Director

**STATIONARY SOURCE PERMIT TO CONSTRUCT AND OPERATE
STATIONARY SOURCE PERMIT TO OPERATE**

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia
Regulations for the Control and Abatement of Air Pollution,

Milams Equipment Sales Inc
5190 South Boston Highway
Sutherlin, VA 24594
Registration No.: 21696

is authorized to construct and operate

a heavy equipment repair, refurbish and resale facility

located at

5190 South Boston Highway, Sutherlin, VA 24594

in accordance with the Conditions of this permit.

Approved on DRAFT.

Robert J. Weld
Regional Director, Department of Environmental Quality

Permit consists of 11 pages.
Permit Conditions 1 to 29.

INTRODUCTION

This permit approval is based on the permit application dated October 4, 2021, and supplemental information dated November 8, 2021. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action. In addition, this facility may be subject to additional applicable requirements not listed in this permit.

Words or terms used in this permit shall have meanings as provided in 9VAC5-10-10 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution. The regulatory reference or authority for each condition is listed in parentheses () after each condition. The most recent effective date for a term or condition is listed in brackets []. When identical conditions on approval for an emission unit or units are combined, the effective date listed in this permit does not alter the prior effective date(s) for any such conditions as issued in a previous permit approval. In accordance with 9VAC5-80-1120F, any condition not marked as state-only enforceable (SOE) is state and federally enforceable.

Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact.

The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.2-3700 through 2.2-3714 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9VAC5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

Equipment List - Equipment at this facility covered by this permit consists of:

Equipment:

Reference No.	Equipment Description	Rated Capacity	Delegated Federal Requirements
PSB #1	19' x 39' Paint Spray Building #1	5.6 gal/hr	--
PSB #2	24' x 49' Paint Spray Building #2	1.6 gal/hr	--
PSB #3	24' x 49' Paint Spray Building #3	3.8 gal/hr	--
PSB #4	30' x 50' Paint Spray Building #4	2.6 gal/hr	--
PSB #5	30' x 50' Paint Spray Building #5	2.6 gal/hr	--

Specifications included in the above table are for informational purposes only and do not form enforceable terms or conditions of the permit.

PROCESS REQUIREMENTS

1. **Emission Controls** – The facility has 90 days from the date of permit issuance to comply with the conditions of this permit. The 90-day timeframe to comply with the conditions of this permit may be extended if requested by the facility and approved by the DEQ.
(9VAC5-80-1180) [Draft]
2. **Emission Controls** - Particulate emissions (PM, PM10, and PM2.5) from the Paint Spray Building #1 (PSB #1), Paint Spray Building #2 (PSB #2), Paint Spray Building (PSB #3), Paint Spray Building (PSB #4), and Paint Spray Building #5 (PSB #5) shall be controlled by enclosure and venting to fabric filters or equivalent filters. All openings to the Paint Spray Buildings are allowed to be open when no paint spraying is being performed or if the building is under negative pressure and no particulate is being emitted from the openings. The fabric filters shall be provided with adequate access for inspection and shall be in operation when the emission unit it controls is operating.
(9VAC5-80-1180 and 9VAC5-50-260) [Draft]
3. **Control Efficiency** – The fabric filters or equivalent filters controlling each Paint Spray Building (PSB #1 – PSB #5) shall have a manufacturer rated control efficiency for PM, PM10, and PM2.5 of no less than 98 percent, to be demonstrated by manufacturer information approved by DEQ showing the rated control efficiency, or alternative documentation, as approved by DEQ.
(9VAC5-80-1180 and 9VAC5-50-260) [Draft]
4. **Monitoring Devices** – Each Paint Spray Building (PSB #1, PSB #2, PSB #3, PSB #4, PSB #5) shall be equipped with devices to continuously measure the differential pressure across the fabric filters. Each monitoring device shall be installed, maintained, calibrated, and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the fabric filter or equivalent filter is operating.
(9VAC5-80-1180 D) [Draft]
5. **Monitoring Device Observations** – To ensure good performance, the monitoring devices used to comply with Condition 3 shall be observed by the permittee with a frequency of not less than once per day. The permittee shall keep a log of the parametric values recorded during each observation.
(9VAC5-80-1180 D) [Draft]
6. **Emission Controls** - VOC emissions from cleaning or purging operations shall be minimized by use of high pressure water or reduced use of volatile organic compounds.
(9VAC5-80-1180) [Draft]
7. **VOC Work Practice Standards** – At all times the disposal of volatile organic compounds shall be accomplished by taking measures, to the extent practicable, consistent with air

PM10	0.64 lb/hr	2.8 tons/yr
PM2.5	0.64 lb/hr	2.8 tons/yr
Volatile Organic Compounds	2.89 lb/hr	12.7 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Conditions 1, 8 and 17.
 (9VAC5-80-1180 and 9VAC5-50-260) [Draft]

11. **Emission Limits** - Emissions from the operation of the Paint Spray Building # 2 (PSB #2) shall not exceed the limits specified below:

PM	0.27 lb/hr	0.6 tons/yr
PM10	0.27 lb/hr	0.6 tons/yr
PM2.5	0.27 lb/hr	0.6 tons/yr
Volatile Organic Compounds	0.81 lb/hr	3.6 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Conditions 1, 8 and 17.
 (9VAC5-80-1180 and 9VAC5-50-260) [Draft]

12. **Emission Limits** - Emissions from the operation of the Paint Spray Building #3 (PSB #3) shall not exceed the limits specified below:

PM	0.64 lb/hr	2.8 tons/yr
PM10	0.64 lb/hr	2.8 tons/yr
PM2.5	0.64 lb/hr	2.8 tons/yr
Volatile Organic Compounds	1.92 lb/hr	8.4 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Conditions 1, 8 and 17.
 (9VAC5-80-1180 and 9VAC5-50-260) [Draft]

13. **Emission Limits** - Emissions from the operation of the Paint Spray Building #4 (PSB #4) shall not exceed the limits specified below:

PM	0.31 lb/hr	1.3 tons/yr
PM10	0.31 lb/hr	1.3 tons/yr
PM2.5	0.31 lb/hr	1.3 tons/yr
Volatile Organic Compounds	1.34 lb/hr	5.9 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Conditions 1, 8 and 17.
 (9VAC5-80-1180 and 9VAC5-50-260) [Draft]

14. **Emission Limits** - Emissions from the operation of the Paint Spray Building #5 (PSB #5) shall not exceed the limits specified below:

PM	0.31 lb/hr	1.3 tons/yr
PM10	0.31 lb/hr	1.3 tons/yr
PM2.5	0.31 lb/hr	1.3 tons/yr
Volatile Organic Compounds	1.34 lb/hr	5.9 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Conditions 1, 8 and 17.
 (9VAC5-80-1180 and 9VAC5-50-260) [Draft]

15. **State Operating Permit Emission Limits** - Hazardous air pollutant (HAP) emissions, as defined by §112(b) of the Clean Air Act, from the facility shall not exceed the limits specified below:

Single HAP	9.5 tons/year
Any combination of HAPs	24.5 tons/year

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance for the consecutive 12-month period

shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9VAC5-80-850) [Draft]

16. **Visible Emission Limit** - Visible emissions from the Paint Spray Buildings #1 through #5 shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9VAC5-80-1180 and 9VAC5-50-260) [Draft]

RECORDS

17. **On Site Records** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Blue Ridge Regional Office. These records shall include, but are not limited to:
- a. Daily and monthly throughput of volatile organic compound to each Paint Spray Building (PSB #1 – PSB #5) (in lbs).
 - b. Annual throughput of volatile organic compound to each Paint Spray Building (PSB #1 – PSB #5) (in tons), calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
 - c. Annual VOC emissions from each Paint Spray Building (PSB #1 – PSB #5). Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
 - d. Material Safety Data Sheets (MSDS) or other vendor information showing VOC content, toxic compound content, water content, solids content, and density for each coating, thinner, and cleaning solution used.
 - e. Scheduled and unscheduled maintenance and operator training.
 - f. Manufacturer specifications verifying control efficiency for the filters used in the Paint Spray Buildings to demonstrate compliance with Condition 3.
 - g. Operation and control device monitoring records for the filters as required in Condition 5.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

(9VAC5-80-1180 and 9VAC5-50-50) [Draft]

18. **State Operating Permit On Site Records** – The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Blue Ridge Regional Office. These records shall include, but are not limited to:

- a. Annual throughput of HAPs to verify compliance with Condition 8, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
- b. Monthly and annual HAP emissions from the facility to verify compliance with the ton/yr emission limitations in Condition 15. Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.

(9VAC5-80-900) [Draft]

19. **Emissions Testing** - The facility shall be constructed so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. Sampling ports shall be provided when requested at the appropriate locations and safe sampling platforms and access shall be provided.

(9VAC5-50-30 F and 9VAC5-80-1180) [Draft]

NOTIFICATIONS

20. **Initial Notifications** - The permittee shall furnish written notification to the Blue Ridge Regional Office of:

- a. The actual date on which modification of the Paint Spray Buildings (PSB #1 – PSB #5) commenced within 30 days after such date.
- b. The actual start-up date of each modified Paint Spray Building (PSB #1 – PSB #5) within 15 days after such date.

(9VAC5-50-50 and 9VAC5-80-1180)

GENERAL CONDITIONS

21. **Permit Invalidation** - This permit to construct the stationary source shall become invalid, unless an extension is granted by the DEQ, if:

- a. A program of continuous construction is not commenced within 18 months from the date of this permit.
- b. A program of construction is discontinued for a period of 18 months or more, or is not completed within a reasonable time, except for a DEQ approved period between phases of the phased construction of a new stationary source or project.

(9VAC5-80-1210)

22. **Permit Suspension/Revocation** - This permit may be suspended or revoked if the permittee:

- a. Knowingly makes material misstatements in the permit application or any amendments to it;
- b. Fails to comply with the conditions of this permit;
- c. Fails to comply with any emission standards applicable to a permitted emissions unit;
- d. Causes emissions from the stationary source which result in violations of, or interfere with the attainment and maintenance of, any ambient air quality standard; or
- e. Fails to operate in conformance with any applicable control strategy, including any emission standards or emissions limitations, in the State Implementation Plan in effect at the time an application for this permit is submitted.

(9VAC5-80-1010 and 9VAC5-80-1210 G)

23. **Right of Entry** - The permittee shall allow authorized local, state, and federal representatives, upon the presentation of credentials:

- a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;
- b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;

- c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations; and
- d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.
(9VAC5-170-130, 9VAC5-80-850, and 9VAC5-80-1180)

24. **Maintenance/Operating Procedures** - At all times, including periods of start-up, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate the affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.

The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment and process equipment which affect such emissions:

- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
- b. Maintain an inventory of spare parts.
- c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
- d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures, prior to their first operation of such equipment. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.
(9VAC5-50-20 E, 9VAC5-80-850, and 9VAC5-80-1180 D)

25. **Record of Malfunctions** - The permittee shall maintain records of the occurrence and duration of any bypass, malfunction, shutdown or failure of the facility or its associated air pollution control equipment that results in excess emissions for more than one hour. Records shall include the date, time, duration, description (emission unit, pollutant affected, cause), corrective action, preventive measures taken and name of person generating the record.
(9VAC5-20-180 J, 9VAC5-80-850, and 9VAC5-80-1180 D)

26. **Notification for Facility or Control Equipment Malfunction** - The permittee shall furnish notification to the Blue Ridge Regional Office of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour. Such notification shall be made no later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within 14 days of discovery of the malfunction. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify the Blue Ridge Regional Office.
(9VAC5-20-180 C, 9VAC5-80-850, and 9VAC5-80-1180)
27. **Violation of Ambient Air Quality Standard** - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.
(9VAC5-20-180 I, 9VAC5-80-850, and 9VAC5-80-1180)
28. **Change of Ownership** - In the case of a transfer of ownership of a stationary source, the new owner shall abide by any current permit issued to the previous owner. The new owner shall notify the Blue Ridge Regional Office of the change of ownership within 30 days of the transfer.
(9VAC5-80-940 and 9VAC5-80-1240)
29. **Permit Copy** - The permittee shall keep a copy of this permit on the premises of the facility to which it applies.
(9VAC5-80-860D and 9VAC5-80-1180)

SOURCE TESTING REPORT FORMAT

Report Cover

1. Plant name and location
2. Units tested at source (indicate Ref. No. used by source in permit or registration)
3. Test Dates.
4. Tester; name, address and report date

Certification

1. Signed by team leader/certified observer (include certification date)
2. Signed by responsible company official
3. *Signed by reviewer

Copy of approved test protocol

Summary

1. Reason for testing
2. Test dates
3. Identification of unit tested & the maximum rated capacity
4. *For each emission unit, a table showing:
 - a. Operating rate
 - b. Test Methods
 - c. Pollutants tested
 - d. Test results for each run and the run average
 - e. Pollutant standard or limit
5. Summarized process and control equipment data for each run and the average, as required by the test protocol
6. A statement that test was conducted in accordance with the test protocol or identification & discussion of deviations, including the likely impact on results
7. Any other important information

Source Operation

1. Description of process and control devices
2. Process and control equipment flow diagram
3. Sampling port location and dimensioned cross section Attached protocol includes: sketch of stack (elevation view) showing sampling port locations, upstream and downstream flow disturbances and their distances from ports; and a sketch of stack (plan view) showing sampling ports, ducts entering the stack and stack diameter or dimensions

Test Results

1. Detailed test results for each run
2. *Sample calculations
3. *Description of collected samples, to include audits when applicable

Appendix

1. *Raw production data
2. *Raw field data
3. *Laboratory reports
4. *Chain of custody records for lab samples
5. *Calibration procedures and results
6. Project participants and titles
7. Observers' names (industry and agency)
8. Related correspondence
9. Standard procedures

* Not applicable to visible emission evaluations